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*Attorneys for Defendants City of
Phoenix, Sullivan, Ladines, Garza, Roy,
Makic, Ravelo, Ramirez, Howard,
Traylor, and Reddy*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Kashane Kirk, *et al.*,

Plaintiffs,

vs.

City of Phoenix, *et al.*,

Defendants.

Case No. CV 23-00836-MTL (CDB)

**STIPULATION FOR EXTENSION
OF TIME FOR DEFENDANTS TO
FILE INITIAL RESPONSIVE
PLEADING**

(Second Request)

**EXPEDITED CONSIDERATION
REQUESTED**

Plaintiffs Kashane Kirk, Sharon Roberts, and Brittnie Turner (collectively referred to hereinafter as “Plaintiffs”), and Defendants City of Phoenix, Phoenix Police Department, Chief Michael Sullivan, Officer Autumn Ladines, Officer Antonio Garza, Sergeant Eric Roy, Officer Makic, Officer Jaclyn Ravelo, Officer Steven Ramirez, Sergeant Jonathan Howard, Officer Morgan Traylor and Officer Reddy (collectively referred to hereinafter as “Defendants”), by and through counsel undersigned, and pursuant to LRCiv 7.3, hereby stipulate and jointly request an extension of time for Defendants to file their responsive pleading to Plaintiffs’ Complaint from October 2, 2023, until October 20, 2023.

1 Good cause exists for the extension because the parties are currently discussing
 2 several positions Defendants intend to raise in a motion to dismiss. Defendants' counsel
 3 communicated their position regarding their motion to dismiss in accordance with Local
 4 Rule 12.1(c), on September 21, 2023, and Plaintiffs' counsel requires additional time to
 5 evaluate and respond to those positions. Additionally, Defendants' lead counsel will be out
 6 of the Country for two weeks, from September 29, 2023, through October 13, 2023, with
 7 very limited telephone/computer access for the better part of that time, and Defendants'
 8 lead counsel would like to be available for final discussion regarding Defendants' positions
 9 on the motion to dismiss, as well as the opportunity to review ultimate drafts of the
 10 responsive pleadings prior to filing.

11 This second request is not for the purpose of delay and is sought only for good cause
 12 and to allow time for the parties to potentially reach agreements on streamlining briefing
 13 and pleading herein.

14 For the foregoing reasons, the parties respectfully request a brief extension for
 15 Defendants to file their initial responsive pleading to Plaintiffs' Complaint. A proposed
 16 order is filed herewith.

17 RESPECTFULLY SUBMITTED this 2nd day of October, 2023.

18 BROENING OBERG WOODS & WILSON, P.C.

19 By /s/ Sarah L. Barnes
 20 Sarah L. Barnes
 21 Kelley M. Jancaitis
 22 *Attorney for Defendants City of Phoenix,*
Sullivan, Ladines, Garza, Roy, Makic, Ravelo,
Ramirez, Howard, Traylor, and Reddy

23 MILLS + WOODS LAW, PLLC

24 By /s/ Sean A. Woods (w/permission)
 25 Sean A. Woods
 26 Robert T. Mills
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2023, I electronically transmitted the foregoing with the Clerk of the Court using the CM/ECF system for filing, with copies submitted electronically to the following recipients:

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/s/ Kathy Lake
